

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

BRANDON SIRES,	)	CASE NO.: 1:20-cv-01002
	)	
Plaintiff,	)	JUDGE JAMES S. GWIN
	)	
-vs-	)	
	)	UNOPPOSED
LAUREN FITTS,	)	MOTION TO DISMISS WITH PREJUDICE
	)	
Defendant.	)	(Fed.R.Civ.P. 41(a)(2))
	)	

Now comes Plaintiff BRANDON SIRES, by and through his undersigned counsel, and, pursuant to Fed.R.Civ.P. 41(a)(2), hereby moves this Honorable Court for an Order dismissing all causes of action set forth in the within matter, *with prejudice*, subject to the terms and conditions set forth in the document captioned *Mutual Release of All Claims*, which has been signed by all parties to the within matter, and subject to this Court's continuing jurisdiction over the Mutual Release of All Claims for purposes of enforcement. Each party hereto shall bear their own costs.

Defendant has no objection to the within *Unopposed Motion to Dismiss With Prejudice*, as verified by Defendant's counsel's signature below.

Accordingly, Plaintiff BRANDON SIRES respectfully moves this Honorable Court for an Order:

- (a) Dismissing Plaintiff's causes of action set forth herein *with prejudice*, with each party to bear his or her own costs;
- (b) That the dismissal is subject to the terms and conditions of the *Mutual Release of All Claims*, a copy of which has been filed under seal herein;

- (c) All of the terms and conditions of the *Mutual Release of All Claims* are hereby incorporated herein, as if fully restated;
- (d) That this Court retains jurisdiction to enforce the terms and conditions of the *Mutual Release of All Claims*.

Respectfully Submitted,

/s/ Larry W. Zukerman

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**Counsel for Plaintiff Brandon Sires**

**DEFENDANT LAUREN FITTS' VERIFICATION OF NO OBJECTION:**

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**Counsel for Defendant Lauren Fitts**



- (c) All of the terms and conditions of the *Mutual Release of All Claims* are hereby incorporated herein, as if fully restated;
- (d) That this Court retains jurisdiction to enforce the terms and conditions of the *Mutual Release of All Claims*.

Respectfully Submitted,

/s/ Larry W. Zukerman

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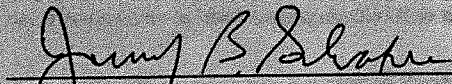
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the forgoing *Unopposed Motion to Dismiss With Prejudice* was filed electronically on this 9 day of September, 2020. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access the document via the Court's electronic filing system.

/s/ Larry W. Zukerman

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